

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No.06-36

Annual Section 64.2009(e) CPNI Certification for 2018

Date Filed: January 19, 2018

Name of companies covered by this certification:

- Sunesys, LLC (Filer No. 824934)

Name and Title of Signatory: Monica Gambino -Vice President — Legal

I, Monica Gambino, certify that I am an officer of Sunesys, LLC (the “Company”), and acting as an agent of the Company, I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission’s CPNI rules, 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the Company’s procedures ensure that the Company is in compliance with the requirements set forth in Section 64.2001, *et seq.* of the Commission’s rules.

The Company did not take any actions (proceedings instituted or petitions filed by a company at state commissions, in the court system or at the Commission) against data brokers in 2017. The company did not receive any customer complaints during 2017 concerning the unauthorized release of CPNI.

The Company does not have any information outside of the information that is publicly available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are highlighted in the attached document.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Monica Gambino

Vice President — Legal

Sunesys, LLC

Date: 1-19-18

Sunesys, LLC
Statement Regarding Customer Proprietary Network Information Operating Procedures

Sunesys, LLC (“Sunesys”) in accordance with Section 64.2009(c), submits this statement summarizing how the Sunesys’ operating procedures are designed to ensure compliance with the Commission’s CPNI rules. Sunesys provides dark fiber networks to commercial and non-profit entities and to other telecommunications carriers and managed wide area network services to public school and library systems. This statement summarizes the procedures that Sunesys has implemented to safeguard the CPNI of its customers.

Sunesys values its customers’ privacy and takes measures to protect CPNI. It is Sunesys’ policy to protect the confidentiality of its customers’ information. Sunesys does not use, disclose or permit access to its customers’ CPNI except as such use, disclosure or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commissions implementing rules.

As necessary, Sunesys may use CPNI for the permissible purposes enumerated in the Act and the Commission’s rules, including, but not limited to, initiating, rendering, billing and collecting for telecommunications services. Sunesys may also use CPNI to protect its rights or property.

Sunesys has in place a process for verifying its customers’ identity during an inbound call. Except for business customers who have specifically authorized release of CPNI pursuant to a procedure established by contract, Sunesys does not release call detail information during an inbound call.

Sunesys trains its personnel in the use of CPNI. Sunesys has an express disciplinary process in place for violations of Sunesys’ CPNI policies.

Sunesys does not use CPNI to market products or services to customers outside of the category of service to which the customer already subscribes. Sunesys does not share CPNI with affiliates or third parties for marketing purposes. If, in the future, Sunesys seeks to use CPNI for these purposes, it will provide the appropriate notice to its customers and will maintain a list of customer preferences. Sunesys also will maintain a record of any marketing campaign in accordance with the Commission’s rules.

Sunesys takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. Sunesys has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach which results in the unauthorized access to, use or disclosure CPNI. Sunesys will maintain a record of the notification in accordance with the Commission’s rules.

Sunesys has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.